

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

Civil Docket Number: _____

IRAN SHORT FORM
COMPLAINT AND DEMAND
FOR TRIAL BY JURY

Marinella Hemenway, individually, as surviving spouse of Ronald J. Hemenway

John Doe 27, being intended to designate the Personal Representative of the Estate of Ronald J. Hemenway, deceased, said name being fictitious, her/his true name is not presently known, confirmed, and/or has not been duly appointed by a court of competent jurisdiction (or having been so appointed, his or her appointment has expired, and/or he or she has ceased to serve, and his or her successor has not yet been appointed) and on behalf of all survivors and all legally entitled beneficiaries and family members of Ronald J. Hemenway

Stefan Hemenway, individually, as surviving child of Ronald J. Hemenway

Desiree Hemenway, individually, as surviving child of Ronald J. Hemenway

Shirley Hemenway, individually, as surviving parent of Ronald J. Hemenway

Robert B. Hemenway Sr., individually, as surviving parent of Ronald J. Hemenway

Kathleen Novich, individually, as surviving sibling of Ronald J. Hemenway

John Doe 28, being intended to designate the Personal Representative of the Estate of DaJuan Hodges, deceased, said name being fictitious, her/his true name is not presently known, confirmed, and/or has not been duly appointed by a court of competent jurisdiction (or having been so appointed, his or her appointment has expired, and/or he or she has ceased to serve, and his or her successor has not yet been appointed) and on behalf of all survivors and all legally entitled beneficiaries and family members of DaJuan Hodges

Joan M. Houston as Personal Representative of the Estate of Joan McQuillen, deceased, the late parent of Charles J. Houston

Trina Sabb, individually, as surviving sibling of Lamar D. Hulse

John Doe 29, being intended to designate the Personal Representative of the Estate of John C. Jenkins, deceased, said name being fictitious, her/his true name is not presently known, confirmed, and/or has not been duly appointed by a court of competent jurisdiction (or having been so appointed, his or her appointment has expired, and/or he or she has ceased to serve, and his or her successor has not yet been appointed) and on behalf of all survivors and all legally entitled beneficiaries and family members of John C. Jenkins

John Doe 30, as Personal Representative of the Estate of Florence Detherage, deceased, the late parent of John C. Jenkins

John Doe 31, as Personal Representative of the Estate of Marshall Ray Detherage, deceased, the late parent of John C. Jenkins

John Doe 32, being intended to designate the Personal Representative of the Estate of Charles G. John, deceased, said name being fictitious, her/his true name is not presently known, confirmed, and/or has not been duly appointed by a court of competent jurisdiction (or having been so appointed, his or her appointment has expired, and/or he or she has ceased to serve, and his or her successor has not yet been appointed) and on behalf of all survivors and all legally entitled beneficiaries and family members of Charles G. John

Cleveland B. John, individually, as surviving sibling of Charles G. John

Orwyn John, individually, as surviving sibling of Charles G. John

John Doe 33, being intended to designate the Personal Representative of the Estate of Karen Kincaid, deceased, said name being fictitious, her/his true name is not presently known, confirmed, and/or has not been duly appointed by a court of competent jurisdiction (or having been so appointed, his or her appointment has expired, and/or he or she has ceased to serve, and his or her successor has not yet been appointed) and on

behalf of all survivors and all legally entitled beneficiaries and family members of Karen Kincaid

Kristian G. Kincaid, individually, as surviving sibling of Karen Kincaid

Kathryn "Kay" D'Amico, individually, as surviving sibling of Karen Kincaid

Karyl Kincaid-Noel, individually, as surviving sibling of Karen Kincaid

Karen Barrett, as the co-Personal Representative of the Estate of Lucille T. King, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of Lucille T. King

Robert Murray, as the co-Personal Representative of the Estate of Lucille T. King, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of Lucille T. King

John Doe 34, being intended to designate the Personal Representative of the Estate of Ronald Philip Kloefer, deceased, said name being fictitious, her/his true name is not presently known, confirmed, and/or has not been duly appointed by a court of competent jurisdiction (or having been so appointed, his or her appointment has expired, and/or he or she has ceased to serve, and his or her successor has not yet been appointed) and on behalf of all survivors and all legally entitled beneficiaries and family members of Ronald Philip Kloefer

Christopher Kloefer, individually, as surviving sibling of Ronald Philip Kloefer

Carolyn LaFrance, individually, as surviving sibling of Alan LaFrance

John Doe 35, being intended to designate the Personal Representative of the Estate of William D. Lake, deceased, said name being fictitious, her/his true name is not presently known, confirmed, and/or has not been duly appointed by a court of competent jurisdiction (or having been so appointed, his or her appointment has expired, and/or he or she has ceased to serve, and his or her successor has not yet been appointed) and on behalf of all survivors and all legally entitled beneficiaries and family members of William D. Lake

John Doe 36, being intended to designate the Personal

Representative of the Estate of Kenneth Charles Ledee, deceased, said name being fictitious, her/his true name is not presently known, confirmed, and/or has not been duly appointed by a court of competent jurisdiction (or having been so appointed, his or her appointment has expired, and/or he or she has ceased to serve, and his or her successor has not yet been appointed) and on behalf of all survivors and all legally entitled beneficiaries and family members of Kenneth Charles Ledee

Olivia Ledee Lindsey, individually, as surviving child of Kenneth Charles Ledee

Anna Ledee, individually, as surviving parent of Kenneth Charles Ledee

Jessica Leduc, individually, as surviving child of Alexis Leduc

Alexis John Leduc, individually, as surviving child of Alexis Leduc

Leslie K. Lesperance, individually, as surviving child of Charles A. Lesperance

Leslie K. Lesperance, as the co-Personal Representative of the Estate of Charles A. Lesperance, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of Charles A. Lesperance

Nilaja A. Shealy-Loveless, individually, as surviving child of Charles A. Lesperance

John Doe 37, being intended to designate the Personal Representative of the Estate of Nancy Liz, deceased, said name being fictitious, her/his true name is not presently known, confirmed, and/or has not been duly appointed by a court of competent jurisdiction (or having been so appointed, his or her appointment has expired, and/or he or she has ceased to serve, and his or her successor has not yet been appointed) and on behalf of all survivors and all legally entitled beneficiaries and family members of Nancy Liz

Jose Liz a/k/a Domingo Liz, individually, as surviving sibling of Nancy Liz

Jose Liz a/k/a Domingo Liz as Personal Representative of the Estate of Jose Liz, Sr., deceased, the late parent of Nancy Liz

Matthew J. Liz-Ramirez, individually, as surviving child of Nancy Liz

Anastasia Mancini a/k/a Anastasia Louvelos, individually, as surviving spouse of Francisco M. Mancini a/k/a Frank Mancini

Anastasia Mancini a/k/a Anastasia Louvelos, as the Personal Representative of the Estate of Francisco Mancini (a/k/a Frank Mancini), deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of Francisco M. Mancini a/k/a Frank Mancini

Anastasia Mancini a/k/a Anastasia Louvelos, as Natural Guardian of SM, a minor, as surviving child of Francisco M. Mancini a/k/a Frank Mancini

Anthony Mancini, individually, as surviving sibling of Francisco M. Mancini a/k/a Frank Mancini

Anthony Mancini as the Personal Representative of the Estate of Lea Sola (a/k/a Lea Mancini), deceased, the late parent of Francisco M. Mancini a/k/a Frank Mancini

John Doe 38, being intended to designate the Personal Representative of the Estate of Louis N. Mariani, deceased, said name being fictitious, her/his true name is not presently known, confirmed, and/or has not been duly appointed by a court of competent jurisdiction (or having been so appointed, his or her appointment has expired, and/or he or she has ceased to serve, and his or her successor has not yet been appointed) and on behalf of all survivors and all legally entitled beneficiaries and family members of Louis N. Mariani

John Doe 39, being intended to designate the Personal Representative of the Estate of William A. Mathesen, deceased, said name being fictitious, her/his true name is not presently known, confirmed, and/or has not been duly appointed by a court of competent jurisdiction (or having been so appointed, his or her appointment has expired, and/or he or she has ceased to serve, and his or her successor has not yet been appointed) and on behalf of all survivors and all legally entitled beneficiaries and family members of William A. Mathesen

John Doe 40, being intended to designate the Personal Representative of the Estate of Robert G. McIlvaine,

deceased, said name being fictitious, her/his true name is not presently known, confirmed, and/or has not been duly appointed by a court of competent jurisdiction (or having been so appointed, his or her appointment has expired, and/or he or she has ceased to serve, and his or her successor has not yet been appointed) and on behalf of all survivors and all legally entitled beneficiaries and family members of Robert G. McIlvaine

Dolores Lara, individually, as surviving parent of Manuel E. Mejia

Ana I. Peguero-Miliano, individually, as surviving spouse of Manuel E. Mejia

Jacqueline Mejia Peguero, individually, as surviving child of Manuel E. Mejia

Jose Miguel Mejia Peguero, individually, as surviving child of Manuel E. Mejia

Manuel E. Mejia Peguero, individually, as surviving child of Manuel E. Mejia

John Doe 41, being intended to designate the Personal Representative of the Estate of Nurul Miah, deceased, said name being fictitious, her/his true name is not presently known, confirmed, and/or has not been duly appointed by a court of competent jurisdiction (or having been so appointed, his or her appointment has expired, and/or he or she has ceased to serve, and his or her successor has not yet been appointed) and on behalf of all survivors and all legally entitled beneficiaries and family members of Nurul Miah

Sharif Chowdhury & Showkatara Sharif as Personal Representatives of the Estate of Shakila Yasmin, deceased, the late spouse of Nurul Miah

Bakul Miah, individually, as surviving sibling of Nurul Miah

Jane Doe 42, being intended to designate the Personal Representative of the Estate of Philip D. Miller, deceased, said name being fictitious, her/his true name is not presently known, confirmed, and/or has not been duly appointed by a court of competent jurisdiction (or having been so appointed, his or her appointment has expired, and/or he or she has ceased to serve, and his or her successor has not yet been appointed) and on

behalf of all survivors and all legally entitled beneficiaries and family members of Philip D. Miller

Arlene Miller, individually, as surviving spouse of Philip D. Miller

John Doe 43, being intended to designate the Personal Representative of the Estate of Peter A. Nelson, deceased, said name being fictitious, her/his true name is not presently known, confirmed, and/or has not been duly appointed by a court of competent jurisdiction (or having been so appointed, his or her appointment has expired, and/or he or she has ceased to serve, and his or her successor has not yet been appointed) and on behalf of all survivors and all legally entitled beneficiaries and family members of Peter A. Nelson

Robert T. Ogren, as the Personal Representative of the Estate of Joseph J. Ogren, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of Joseph J. Ogren

Dorothy Ogren, individually, as surviving parent of Joseph J. Ogren

Lance Edward Ogren, individually, as surviving sibling of Joseph J. Ogren

Jean Oitice, as the Personal Representative of the Estate of Samuel Oitice, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of Samuel Oitice

John Doe 44, being intended to designate the Personal Representative of the Estate of James W. Parham, deceased, said name being fictitious, her/his true name is not presently known, confirmed, and/or has not been duly appointed by a court of competent jurisdiction (or having been so appointed, his or her appointment has expired, and/or he or she has ceased to serve, and his or her successor has not yet been appointed) and on behalf of all survivors and all legally entitled beneficiaries and family members of James W. Parham

John Doe 45, being intended to designate the Personal Representative of the Estate of Leobardo L. Pascual, deceased, said name being fictitious, her/his true name is not presently known, confirmed, and/or has not been duly appointed by a court of competent jurisdiction (or having been so appointed, his or her appointment has

expired, and/or he or she has ceased to serve, and his or her successor has not yet been appointed) and on behalf of all survivors and all legally entitled beneficiaries and family members of Leobardo L. Pascual

Ana Pascual Ortiz, individually, as surviving parent of Leobardo L. Pascual

Mirna Huerta Aguirre, individually, as surviving spouse of Leobardo L. Pascual

Diego Lopez Reyes, individually, as surviving child of Leobardo L. Pascual

Juan Lopez Reyes, individually, as surviving child of Leobardo L. Pascual

Lizeth Lopez Huerta, individually, as surviving child of Leobardo L. Pascual

Mariela Lopez Huerta, individually, as surviving child of Leobardo L. Pascual

Cristobal Lopez, individually, as surviving sibling of Leobardo L. Pascual

Rafael Lopez Pascual, individually, as surviving sibling of Leobardo L. Pascual

Ana Luisa Lopez Pascual, individually, as surviving sibling of Leobardo L. Pascual

Graciela Lopez Pascual, individually, as surviving sibling of Leobardo L. Pascual

Flor Lopez Pascual, individually, as surviving sibling of Leobardo L. Pascual

Elena De La Cruz Lopez Pascual, individually, as surviving sibling of Leobardo L. Pascual

Maria Elvia Lopez Pascual, individually, as surviving sibling of Leobardo L. Pascual

Manuela Lopez Pascual, individually, as surviving sibling of Leobardo L. Pascual

Raquel Lopez Pascual, individually, as surviving sibling of Leobardo L. Pascual

Janet Lopez Pascual, individually, as surviving sibling of Leobardo L. Pascual

Carmen Yosef Lopez, individually, as surviving sibling of Leobardo L. Pascual

Terilyn Patrick Esse a/k/a Terilyn Patrick,
individually, as surviving spouse of James Patrick

Terilyn Patrick Esse a/k/a Terilyn Patrick, as the
Personal Representative of the Estate of James Patrick,
deceased, and on behalf of all survivors and all legally
entitled beneficiaries and family members of James
Patrick

Terilyn Patrick Esse a/k/a Terilyn Patrick, as Natural
Guardian of JJPE a/k/a JJP, a minor, as surviving child
of James Patrick

John Doe 46, being intended to designate the Personal
Representative of the Estate of Anthony Portillo,
deceased, said name being fictitious, her/his true name
is not presently known, confirmed, and/or has not been
duly appointed by a court of competent jurisdiction (or
having been so appointed, his or her appointment has
expired, and/or he or she has ceased to serve, and his
or her successor has not yet been appointed) and on
behalf of all survivors and all legally entitled
beneficiaries and family members of Anthony Portillo

Natalie Quappe, individually, as surviving child of
Lincoln Quappe

Clint Quappe, individually, as surviving child of
Lincoln Quappe

Kerene Reeves aka Kerene Sherica Clarke,
individually, as surviving child of Carol Rabalais a/k/a
Carol South-Rabalais

Kerene Reeves aka Kerene Sherica Clarke, as the
Personal Representative of the Estate of Carol
Rabalais a/k/a Carol South-Rabalais, deceased, and on
behalf of all survivors and all legally entitled
beneficiaries and family members of Carol Rabalais
a/k/a Carol South-Rabalais

Samantha Blake a/k/a Samantha Bianca Herring,
individually, as surviving child of Carol Rabalais a/k/a
Carol South-Rabalais

Selvyn Neil Patrick Blake, individually, as surviving
child of Carol Rabalais a/k/a Carol South-Rabalais

Mary Agatha South, individually, as surviving parent
of Carol Rabalais a/k/a Carol South-Rabalais

John Doe 47, being intended to designate the Personal
Representative of the Estate of Laura Ragonese-Snik,

deceased, said name being fictitious, her/his true name is not presently known, confirmed, and/or has not been duly appointed by a court of competent jurisdiction (or having been so appointed, his or her appointment has expired, and/or he or she has ceased to serve, and his or her successor has not yet been appointed) and on behalf of all survivors and all legally entitled beneficiaries and family members of Laura Ragonese-Snik

John Doe 48, being intended to designate the Personal Representative of the Estate of John Rhodes, deceased, said name being fictitious, her/his true name is not presently known, confirmed, and/or has not been duly appointed by a court of competent jurisdiction (or having been so appointed, his or her appointment has expired, and/or he or she has ceased to serve, and his or her successor has not yet been appointed) and on behalf of all survivors and all legally entitled beneficiaries and family members of John Rhodes

John Doe 49, as the co-Personal Representative of the Estate of Vernon A. Richard, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of Vernon A. Richard

Jane Doe 50, as the co-Personal Representative of the Estate of Vernon A. Richard, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of Vernon A. Richard

Vernon A. Richard II, individually, as surviving child of Vernon A. Richard

Vernessa Richard, individually, as surviving child of Vernon A. Richard

Vernessa Richard & Vernon A. Richard II as Personal Representatives of the Estate of Dorothy Richard, deceased, the late spouse of Vernon A. Richard

John Doe 51, being intended to designate the Personal Representative of the Estate of Marsha A. Rodriguez, deceased, said name being fictitious, her/his true name is not presently known, confirmed, and/or has not been duly appointed by a court of competent jurisdiction (or having been so appointed, his or her appointment has expired, and/or he or she has ceased to serve, and his or her successor has not yet been appointed) and on behalf of all survivors and all legally entitled

beneficiaries and family members of Marsha A. Rodriguez

John Doe 52, being intended to designate the Personal Representative of the Estate of James Romito, deceased, said name being fictitious, her/his true name is not presently known, confirmed, and/or has not been duly appointed by a court of competent jurisdiction (or having been so appointed, his or her appointment has expired, and/or he or she has ceased to serve, and his or her successor has not yet been appointed) and on behalf of all survivors and all legally entitled beneficiaries and family members of James Romito

Plaintiffs,

-against-

Islamic Republic of Iran,

Defendant.

Plaintiffs named herein by and through the undersigned counsel file this Short Form Complaint against Defendant, the Islamic Republic of Iran (“Iran”), arising out of the September 11, 2001 terrorist attacks (“September 11, 2001 Terrorist Attacks”), as permitted and approved by the Court’s Order of July 10, 2018, ECF No. 4045. Each Plaintiff incorporates by reference the specific allegations, as indicated below, of (a) the Federal Insurance and Ashton Plaintiffs’ Amended Consolidated Complaint Against Defendant, the Islamic Republic of Iran, ECF No. 3237, or (b) the Amended Complaint, Burnett v. Islamic Republic of Iran, No. 15-CV-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53.

Upon filing this Iran Short Form Complaint, each Plaintiff is deemed to have adopted all factual and jurisdictional allegations of the complaint that has been joined as specified below; all causes of action contained within that complaint; all prior filings in connection with that complaint; and all prior Orders and rulings of the Court in connection with that complaint.

Additionally, each Plaintiff incorporates the factual allegations and findings contained in those pleadings and orders filed at Havlish v. Bin Laden, No. 1:03-CV-9848 (GBD)(SN) (S.D.N.Y.), ECF Nos. 263, 294, 295; In re Terrorist Attacks on September 11, 2001, 03-MDL-1570 (GBD)(SN) (S.D.N.Y.), ECF Nos. 2430, 2431, 2432, 2433, 2473, 2515, 2516; and evidence submitted at the proceedings before the Honorable George B. Daniels on December 15, 2011 (ECF No. 2540).

VENUE

1. Venue in this district is proper pursuant to 28 U.S.C. §§ 1391(b)(2) and 1391(f)(1), as a substantial part of the events giving rise to the claims asserted herein occurred in this district. Venue is also proper in this district pursuant to 18 U.S.C. § 2334(a).

JURISDICTION

2. Jurisdiction against the Islamic Republic of Iran is premised on the grounds set forth in the complaints specified below, including but not limited to 28 U.S.C. § 1605(a) (tort exception to the Foreign Sovereign Immunities Act), 28 U.S.C. § 1605A (terrorism exception to the Foreign Sovereign Immunities Act), and 28 U.S.C. § 1605B (Justice Against Sponsors of Terrorism Act).

CAUSES OF ACTION

3. Each Plaintiff hereby adopts and incorporates by reference all factual allegations, jurisdictional allegations, and jury trial demand, including all causes of action against the Islamic Republic of Iran, as set forth in the following complaint [**check only one complaint**]:

☐ Federal Insurance and Ashton Plaintiffs' Amended Consolidated Complaint Against Defendant, the Islamic Republic of Iran, ECF No. 3237

☒ Amended Complaint, Burnett v. Islamic Republic of Iran, No. 15-CV-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53

4. In addition, each Plaintiff hereby asserts the following additional causes of action:

☒ Iran Short Form Complaint First Cause of Action to Recover Wrongful Death Damages Pursuant to 28 U.S.C. § 1605B (the Justice Against Sponsors of Terrorism Act or JASTA) and 18 U.S.C. § 2333 *et seq.* (the Anti-Terrorism Act or ATA)

As a factual basis for this cause of action, Plaintiff(s) allege that the allegations set forth in the complaint noted above, as well as the allegations set forth in the Havlish filings noted above, establish that, as set forth herein, the injuries they suffered arose from the September 11, 2001 Terrorist Attacks; Defendant's role in the September 11, 2001 Terrorist Attacks constituted acts of international terrorism that violated state and federal laws pursuant to 18 U.S.C. § 2331; that the September 11, 2001 Terrorist Attacks constituted acts of international terrorism committed, planned or authorized by an organization that had been designated as a foreign terrorist organization under 8 U.S.C. § 1189; that the September 11, 2001 Terrorist Attacks violated state and federal laws pursuant to 18 U.S.C. § 2331; and that Defendant aided and abetted, by knowingly providing substantial assistance, with others and/or conspired with others who committed an act or acts of international terrorism in violation of 18 U.S.C. § 2333 *et seq.*

☐ Iran Short Form Complaint First Cause of Action to Recover Personal Injury Damages Pursuant to 28 U.S.C. § 1605B (the Justice Against Sponsors of Terrorism Act or JASTA) and 18 U.S.C. § 2333 *et seq.* (the Anti-Terrorism Act or ATA)

As a factual basis for this cause of action, Plaintiff(s) allege that the allegations set forth in the complaint noted above, as well as the allegations set forth in the Havlish filings noted above, establish that, as set forth herein, the injuries they suffered arose from the September 11, 2001 Terrorist Attacks; Defendant's role in the September 11, 2001 Terrorist Attacks constituted acts of international terrorism that violated state and federal laws pursuant to 18 U.S.C. § 2331; that the September 11, 2001 Terrorist Attacks constituted acts of international terrorism committed, planned or authorized by an organization that had been designated as a foreign terrorist organization under 8 U.S.C. § 1189; that the September 11, 2001 Terrorist Attacks violated state and federal laws pursuant to 18 U.S.C. § 2331; and that Defendant aided and abetted, by knowingly providing substantial assistance, with others and/or conspired with others who committed an act or acts of international terrorism in violation of 18 U.S.C. § 2333 *et seq.*

IDENTIFICATION OF NEW PLAINTIFFS

5. The following allegations and information are alleged on behalf of each individual who is bringing this claim, as indicated on Appendix 1 to this Iran Short Form Complaint, herein referred to as "Plaintiffs."

- a. The citizenship/nationality of each Plaintiff is indicated at Appendix 1 to this Iran Short Form Complaint.

- b. Plaintiff is entitled to recover damages on the causes of action set forth in the complaint identified above, as joined by this Iran Short Form Complaint, and as further asserted within this Iran Short Form Complaint.
- c. As indicated at Appendix 1, Plaintiff (i) is the estate representative of someone who was killed as a result of the September 11, 2001 Terrorist Attacks; (ii) is the surviving immediate family member of someone who was killed as a result of the September 11, 2001 Terrorist Attacks; and/or (iii) suffered physical injuries as a result of the September 11, 2001 Terrorist Attacks.
- d. For those plaintiffs with personal injury claims, as indicated in Appendix 1, on or after September 11, 2001, said Plaintiff was present at the Pentagon and/or the World Trade Center site and/or its surroundings and/or lower Manhattan and/or at an area wherein he/she was exposed to toxins as a result of the terrorist attacks and was exposed to toxins from the attacks, and/or was otherwise injured, and/or as otherwise alleged, as stated specifically in Appendix 1.
- e. For those plaintiffs with personal injury and/or wrongful death claims, as indicated in Appendix 1, as a direct, proximate and foreseeable result of Defendant's actions or inactions, Plaintiff or his or her decedent suffered bodily injury and/or death, and consequently economic and other losses, including but not limited to pain and suffering, emotional distress, psychological injuries, and loss of enjoyment of life, and/or as described in the Iran Short Form Complaint, and/or as otherwise may be specified in subsequent discovery proceedings, and/or as otherwise alleged in Appendix 1.
- f. The name, relationship to the injured and/or deceased September 11 victim, residency, citizenship/nationality, and the general nature of the claim for each plaintiff asserting wrongful death and/or solatium claims is listed on the attached Appendix 1, and is incorporated herein as allegations, with all allegations of the related complaints, as specified above, deemed alleged as to each Plaintiff.

IDENTIFICATION OF THE DEFENDANT

- 6. The only Defendant named in this Iran Short Form Complaint is the Islamic Republic of Iran.

NO WAIVER OF OTHER CLAIMS

- 7. By filing this Iran Short Form Complaint, Plaintiffs are not waiving any right to file suit against any other potential defendants or parties.

8. By filing this Iran Short Form Complaint, Plaintiffs are not opting out of any class that the Court may certify in the future.

JURY DEMAND

9. Each Plaintiff hereby demands a trial by jury as to the claims in this action.

WHEREFORE, Plaintiffs pray for relief and judgment against Defendant as set forth in this Iran Short Form Complaint as appropriate.

Dated: December 27, 2018

Respectfully submitted,

/s/ Jerry S. Goldman

Jerry S. Goldman

Bruce Strong

ANDERSON KILL P.C.

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New York, New York

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Attorneys for Plaintiffs

APPENDIX

Each line below is deemed an allegation, incorporating the allegations, language, and references within the Iran Short Form Complaint to which this Appendix 1 is appended and shall be referenced as Allegation 1 of Appendix 1 to the Iran Short Form Complaint, Allegation 2 of Appendix 1 to the Iran Short Form Complaint, etc.

	Plaintiff's Name (alphabetical by last name)	Plaintiff's State of Residency at Filing (or death)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Full Name	Plaintiff's Relationship to 9/11 Decedent¹	9/11 Decedent's Citizenship/ Nationality on 9/11/01	Nature of Claim (wrongful death, solatium, personal injury)²
1	Marinella Hemenway	KS	United States	Ronald J. Hemenway	Spouse	United States	Solatium
2	John Doe 27	DC	United States	Ronald J. Hemenway	PR	United States	Solatium/ Wrongful Death
3	Stefan Hemenway	KS	United States	Ronald J. Hemenway	Child	United States	Solatium
4	Desiree Hemenway	KS	United States	Ronald J. Hemenway	Child	United States	Solatium
5	Shirley Hemenway	MA	United States	Ronald J. Hemenway	Parent	United States	Solatium
6	Robert B. Hemenway Sr.	MA	United States	Ronald J. Hemenway	Parent	United States	Solatium
7	Kathleen Novich	KS	United States	Ronald J. Hemenway	Sibling	United States	Solatium
8	John Doe 28	NY	United States	DaJuan Hodges	PR	United States	Solatium/ Wrongful Death

¹ For those identified as "PR," such claim is made as the Personal Representative of the Decedent's Estate and on behalf of all survivors and all legally entitled beneficiaries and family members of such Decedent as noted in the case caption.

² The PRs identified below are bringing solatium claims on behalf of all survivors and all legally entitled beneficiaries and family members of such Decedent as noted in the case caption.

	Plaintiff's Name (alphabetical by last name)	Plaintiff's State of Residency at Filing (or death)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Full Name	Plaintiff's Relationship to 9/11 Decedent¹	9/11 Decedent's Citizenship/ Nationality on 9/11/01	Nature of Claim (wrongful death, solatium, personal injury)²
9	Joan M. Houston as Personal Representative of the Estate of Joan McQuillen	NY	United States	Charles J. Houston	Parent (Deceased)	United States	Solatium
10	Trina Sabb	NY	United States	Lamar D. Hulse	Sibling	United States	Solatium
11	John Doe 29	MA	United States	John C. Jenkins	PR	United States	Solatium/ Wrongful Death
12	John Doe 30, as Personal Representative of the Estate of Florence Detherage	KY	United States	John C. Jenkins	Parent (Deceased)	United States	Solatium
13	John Doe 31, as Personal Representative of the Estate of Marshall Ray Detherage	KY	United States	John C. Jenkins	Parent (Deceased)	United States	Solatium
14	John Doe 32	NY	United States	Charles G. John	PR	United States	Solatium/ Wrongful Death
15	Cleveland B. John	NY	United States	Charles G. John	Sibling	United States	Solatium
16	Orwyn John	NY	Guyana	Charles G. John	Sibling	United States	Solatium
17	John Doe 33	DC	United States	Karen Kincaid	PR	United States	Solatium/ Wrongful Death
18	Kristian G. Kincaid	IA	United States	Karen Kincaid	Sibling	United States	Solatium
19	Kathryn "Kay" D'Amico	IA	United States	Karen Kincaid	Sibling	United States	Solatium

	Plaintiff's Name (alphabetical by last name)	Plaintiff's State of Residency at Filing (or death)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Full Name	Plaintiff's Relationship to 9/11 Decedent¹	9/11 Decedent's Citizenship/ Nationality on 9/11/01	Nature of Claim (wrongful death, solatium, personal injury)²
20	Karyl Kincaid-Noel	IA	United States	Karen Kincaid	Sibling	United States	Solatium
21	Karen Barrett	NJ	United States	Lucille T. King	co-PR	United States	Solatium/ Wrongful Death
22	Robert Murray	NJ	United States	Lucille T. King	co-PR	United States	Solatium/ Wrongful Death
23	John Doe 34	NY	United States	Ronald Philip Kloepper	PR	United States	Solatium/ Wrongful Death
24	Christopher Kloepper	NY	United States	Ronald Philip Kloepper	Sibling	United States	Solatium
25	Carolyn LaFrance	GA	United States	Alan LaFrance	Sibling	United States	Solatium
26	John Doe 35	NY	United States	William D. Lake	PR	United States	Solatium/ Wrongful Death
27	John Doe 36	NY	United States	Kenneth Charles Ledee	PR	United States	Solatium/ Wrongful Death
28	Olivia Ledee Lindsey	FL	United States	Kenneth Charles Ledee	Child	United States	Solatium
29	Anna Ledee	NY	United States	Kenneth Charles Ledee	Parent	United States	Solatium
30	Jessica Leduc	NJ	United States	Alexis Leduc	Child	United States	Solatium
31	Alexis John Leduc	NJ	United States	Alexis Leduc	Child	United States	Solatium
32	Leslie K. Lesperance	FL	United States	Charles A. Lesperance	Child	United States	Solatium
33	Leslie K. Lesperance	FL	United States	Charles A. Lesperance	co-PR	United States	Solatium/ Wrongful Death
34	Nilaja A. Shealy-Loveless	NJ	United States	Charles A. Lesperance	Child	United States	Solatium

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35	John Doe 37	NY	United States	Nancy Liz	PR	United States	Solatium/ Wrongful Death
36	Jose Liz a/k/a Domingo Liz	TX	United States	Nancy Liz	Sibling	United States	Solatium
37	Jose Liz a/k/a Domingo Liz as Personal Representative of the Estate of Jose Liz, Sr.	NY	United States	Nancy Liz	Parent (Deceased)	United States	Solatium
38	Matthew J. Liz- Ramirez	NY	United States	Nancy Liz	Child	United States	Solatium
39	Anastasia Mancini a/k/a Anastasia Louvelos	NY	United States	Francisco M. Mancini a/k/a Frank Mancini	Spouse	United States	Solatium
40	Anastasia Mancini a/k/a Anastasia Louvelos	NY	United States	Francisco M. Mancini a/k/a Frank Mancini	PR	United States	Solatium/ Wrongful death
41	Anastasia Mancini a/k/a Anastasia Louvelos, as Natural Guardian of SM	NY	United States	Francisco M. Mancini a/k/a Frank Mancini	Child (Minor)	United States	Solatium
42	Anthony Mancini	NY	United States	Francisco M. Mancini a/k/a Frank Mancini	Sibling	United States	Solatium
43	Anthony Mancini as the Personal Representative of the Estate of Lea Sola (a/k/a Lea Mancini)	NY	United States	Francisco M. Mancini a/k/a Frank Mancini	Parent (Deceased)	United States	Solatium

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44	John Doe 38	NH	United States	Louis N. Mariani	PR	United States	Solatium/ Wrongful Death
45	John Doe 39	NJ	United States	William A. Mathesen	PR	United States	Solatium/ Wrongful Death
46	John Doe 40	NY	United States	Robert G. McIlvaine	PR	United States	Solatium/ Wrongful Death
47	Dolores Lara	NY	Dominican Republic	Manuel E. Mejia	Parent	Dominican Republic	Solatium
48	Ana I. Peguero- Miliano	NY	United States	Manuel E. Mejia	Spouse	Dominican Republic	Solatium
49	Jacqueline Mejia Peguero	NY	United States	Manuel E. Mejia	Child	Dominican Republic	Solatium
50	Jose Miguel Mejia Peguero	NY	United States	Manuel E. Mejia	Child	Dominican Republic	Solatium
51	Manuel E. Mejia Peguero	NY	Dominican Republic	Manuel E. Mejia	Child	Dominican Republic	Solatium
52	John Doe 41	NY	United States	Nurul Miah	PR	United States	Solatium/ Wrongful Death
53	Sharif Chowdhury & Showkatara Sharif as Personal Representatives of the Estate of Shakila Yasmin	NY	United States	Nurul Miah	Spouse (Deceased)	United States	Solatium
54	Bakul Miah	NJ	United States	Nurul Miah	Sibling	United States	Solatium
55	Jane Doe 42	NY	United States	Philip D. Miller	PR	United States	Solatium/ Wrongful Death
56	Arlene Miller	MS	United States	Philip D. Miller	Spouse	United States	Solatium

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57	John Doe 43	NY	United States	Peter A. Nelson	PR	United States	Solatium/ Wrongful Death
58	Robert T. Ogren	FL	United States	Joseph J. Ogren	PR	United States	Solatium/ Wrongful Death
59	Dorothy Ogren	NJ	United States	Joseph J. Ogren	Parent	United States	Solatium
60	Lance Edward Ogren	SC	United States	Joseph J. Ogren	Sibling	United States	Solatium
61	Jean Oitice	NY	United States	Samuel Oitice	PR	United States	Solatium/ Wrongful Death
62	John Doe 44	NY	United States	James W. Parham	PR	United States	Solatium/ Wrongful Death
63	John Doe 45	NY	United States	Leobardo L. Pascual	PR	United States	Solatium/ Wrongful Death
64	Ana Pascual Ortiz	CA	Mexico	Leobardo L. Pascual	Parent	Mexico	Solatium
65	Mirna Huerta Aguirre	Mexico	Mexico	Leobardo L. Pascual	Spouse	Mexico	Solatium
66	Diego Lopez Reyes	NJ	Mexico	Leobardo L. Pascual	Child	Mexico	Solatium
67	Juan Lopez Reyes	NJ	Mexico	Leobardo L. Pascual	Child	Mexico	Solatium
68	Lizeth Lopez Huerta	Mexico	Mexico	Leobardo L. Pascual	Child	Mexico	Solatium
69	Mariela Lopez Huerta	Mexico	Mexico	Leobardo L. Pascual	Child	Mexico	Solatium
70	Cristobal Lopez	CA	Mexico	Leobardo L. Pascual	Sibling	Mexico	Solatium
71	Rafael Lopez Pascual	CA	Mexico	Leobardo L. Pascual	Sibling	Mexico	Solatium

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72	Ana Luisa Lopez Pascual	Mexico	Mexico	Leobardo L. Pascual	Sibling	Mexico	Solatium
73	Graciela Lopez Pascual	CA	United States	Leobardo L. Pascual	Sibling	Mexico	Solatium
74	Flor Lopez Pascual	Mexico	Mexico	Leobardo L. Pascual	Sibling	Mexico	Solatium
75	Elena De La Cruz Lopez Pascual	Mexico	Mexico	Leobardo L. Pascual	Sibling	Mexico	Solatium
76	Maria Elvia Lopez Pascual	Mexico	Mexico	Leobardo L. Pascual	Sibling	Mexico	Solatium
77	Manuela Lopez Pascual	Mexico	Mexico	Leobardo L. Pascual	Sibling	Mexico	Solatium
78	Raquel Lopez Pascual	Mexico	Mexico	Leobardo L. Pascual	Sibling	Mexico	Solatium
79	Janet Lopez Pascual	Mexico	Mexico	Leobardo L. Pascual	Sibling	Mexico	Solatium
80	Carmen Yosef Lopez	CA	Mexico	Leobardo L. Pascual	Sibling	Mexico	Solatium
81	Terilyn Patrick Esse a/k/a Terilyn Patrick	CT	United States	James Patrick	Spouse	United States	Solatium
82	Terilyn Patrick Esse a/k/a Terilyn Patrick	CT	United States	James Patrick	PR	United States	Solatium/ Wrongful Death
83	Terilyn Patrick Esse a/k/a Terilyn Patrick, as Natural Guardian of JJPE a/k/a JJP	CT	United States	James Patrick	Child (Minor)	United States	Solatium

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84	John Doe 46	NY	United States	Anthony Portillo	PR	United States	Solatium/ Wrongful Death
85	Natalie Quappe	NY	United States	Lincoln Quappe	Child	United States	Solatium
86	Clint Quappe	NY	United States	Lincoln Quappe	Child	United States	Solatium
87	Kerene Reeves aka Kerene Sherica Clarke	NY	United States	Carol Rabalais a/k/a Carol South-Rabalais	Child	United States	Solatium
88	Kerene Reeves aka Kerene Sherica Clarke	NY	United States	Carol Rabalais a/k/a Carol South-Rabalais	PR	United States	Solatium/ Wrongful Death
89	Samantha Blake a/k/a Samantha Bianca Herring	NY	United States	Carol Rabalais a/k/a Carol South-Rabalais	Child	United States	Solatium
90	Selvyn Neil Patrick Blake	NY	United States	Carol Rabalais a/k/a Carol South-Rabalais	Child	United States	Solatium
91	Mary Agatha South	NY	United States	Carol Rabalais a/k/a Carol South-Rabalais	Parent	United States	Solatium
92	John Doe 47	PA	United States	Laura Ragonese- Snik	PR	United States	Solatium/ Wrongful Death
93	John Doe 48	NJ	United States	John Rhodes	PR	United States	Solatium/ Wrongful Death
94	John Doe 49	NY	United States	Vernon A. Richard	co-PR	United States	Solatium/ Wrongful Death
95	Jane Doe 50	NY	United States	Vernon A. Richard	co-PR	United States	Solatium/ Wrongful Death
96	Vernon A. Richard II	NC	United States	Vernon A. Richard	Child	United States	Solatium

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97	Vernessa Richard	NY	United States	Vernon A. Richard	Child	United States	Solatium
98	Vernessa Richard & Vernon A. Richard II as Personal Representatives of the Estate of Dorothy Richard	NC/NY	United States	Vernon A. Richard	Spouse (Deceased)	United States	Solatium
99	John Doe 51	NJ	United States	Marsha A. Rodriguez	PR	United States	Solatium/ Wrongful Death
100	John Doe 52	NY	United States	James Romito	PR	United States	Solatium/ Wrongful Death